

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HODELL-NATCO ) Case No. 1:08 CV 2755  
INDUSTRIES, INC., )  
 ) Judge: Lesley Wells  
Plaintiff, ) Magistrate Judge:  
 ) Greg White  
vs. )  
 ) VOLUME I  
SAP AMERICA, INC., et )  
al., )  
 )  
Defendants. )

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THE VIDEOCONFERENCE DEPOSITION OF OTTO REIDL

DATE: Tuesday, February 7, 2012

TIME: 9:57 a.m.

PLACE: Reminger & Reminger  
1400 Midland Building  
101 Prospect Avenue, West  
Cleveland, Ohio 44115

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1 the license agreement in 2005, was it your  
2 personal belief that you had any sort of  
3 special relationship with SAP, either SAP  
4 America, or SAP AG, or did you feel that you  
5 were just dealing with them as a business  
6 customer, or -- not the right word -- let me  
7 ask the question again.

8 At the time that you signed the license  
9 agreement in December of 2005, did Hodell  
10 believe that it had any special relationship  
11 with SAP America, or SAP AG, such that it was  
12 in a position of trust or confidence with SAP?

13 MR. LAMBERT: Objection.

14 THE WITNESS: I don't believe it was a  
15 special relationship. I believe a company of  
16 SAP's stature requires an up and up  
17 relationship with all their clients.

18 BY MR. STAR:

19 Q. So you'd agree that when you  
20 signed the license agreement, you had nothing  
21 more than a business to business, or arm's  
22 length relationship between Hodell and SAP,  
23 correct?

24 A. Correct.

25 Q. Let's go off the record for a

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vs. )  
 ) VOLUME II  
SAP AMERICA, INC., et )  
al., )  
 )  
Defendants. )

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THE CONTINUED VIDEOCONFERENCE DEPOSITION OF OTTO REIDL

DATE: Wednesday, February 8, 2012

TIME: 9:41 a.m.

PLACE: Reminger & Reminger  
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101 Prospect Avenue, West  
Cleveland, Ohio 44115

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1 direct conversations with SAP, other than  
2 visits by Mr. Sotnick, were with Kevin.

3 BY MR. STAR:

4 Q. So you have no personal  
5 recollection or --

6 A. I don't recall any specific  
7 conversation where that topic was discussed.

8 Q. Did you personally ever consider,  
9 you personally, ever consider switching from  
10 the Business One platform to the All-in-One  
11 platform?

12 A. Did I consider it?

13 Q. Yes, sir.

14 A. Think about it, meaning I was  
15 willing to do it, or reviewed the possibility?

16 Q. Well, you can use the word  
17 considered as you feel -- as you deem fit.  
18 The question stands. The word has its  
19 ordinary meaning.

20 A. At that point, I had zero  
21 confidence in SAP at this date.

22 Q. As of April of 2007?

23 A. (Witness nods head.)

24 Q. Yes?

25 A. Correct.